

REMARKS

The present application was filed on December 6, 2000 with claims 1 through 22. Claims 1 through 22 are presently pending in the above-identified patent application.

In the Office Action, the Examiner rejected claims 1, 3, 13, 15, and 21 under 35 U.S.C. §103(a) as being unpatentable over Braddy (United States Patent Number 6,304,967) in view of Yoakum et al. (United States Patent Number 6,421,674), rejected claims 2, 4, 5, 14, and 16 under 35 U.S.C. §103(a) as being unpatentable over Braddy and Yoakum in further view of Gampper et al. (United States Patent Number 6,442,601), rejected claim 6 under 35 U.S.C. §103(a) as being unpatentable over Braddy and Yoakum in further view of Smith (United States Patent Number 6,341,311), rejected claims 7-11, 17, 18, (19), 20, and 22 under 35 U.S.C. §103(a) as being unpatentable over Sharma et al. (United States Patent Number 6,182,109) in view of Jordan (United States Patent Number 6,438,652), and rejected claim 12 under 35 U.S.C. §103(a) as being unpatentable over Sharma and Jordan in further view of Smith (United States Patent Number 6,341,311).

Independent Claims 1, 7, 13, 17, 21 and 22

Independent claims 1, 13, and 21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Braddy in view of Yoakum et al., and claims 7, 17, and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sharma et al. in view of Jordan.

Regarding claims 1, 13, and 21, the Examiner asserts that Braddy discloses redirecting said web resource request to a server associated with said file type (col. 15, line 61, to col. 16, line 3; col. 13, lines 50-64).

Applicants note that the term “file type” is well understood in the art to refer to the type of data in the file (e.g., text, image, or video) and the format of the file (e.g., jpeg, gif, and html). In the text cited by the Examiner, Braddy teaches that “the request type is used to determine the appropriate *type of Filter Module 112* of the preferred embodiment to associate, or map, to the request.” (col. 15, lines 56—59; emphasis added.) Braddy further teaches that “a Filter Module 112 is a server side plug-in software module that handles the processing of the request.” (Col. 21, lines 14-16.) Filter Modules 112 are not servers but are components of, for example, the Request Broker

90 (see, FIG. 7). Thus, Braddy teaches to *redirect to a Filter Module within a server*, and does **not** teach to *redirect to a server*. [KEVIN: DOES THIS STATEMENT ADD MUCH: (Braddy teaches that it is the Content Server Manager 106 that is called “to select a local or network server computer system to process the request ‘package,’ and to process the request.” (Col. 15, lines 61-66.))

- 5 Independent claims 1, 13, and 21 require redirecting “said web resource request to a *proxy server* associated with said *file type*.”

Thus, Braddy does not disclose or suggest redirecting said web resource request to a proxy server associated with said file type, as required by independent claims 1, 13, and 21.

- Regarding claims 7, 17, and 22, the Examiner asserts that Sharma discloses
10 determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web request to a server associated with said domain.

- Contrary to the Examiner’s latter assertion, Applicants maintain that Sharma does **not** teach determining if said web resource request is served by a domain having a *traffic volume* that exceeds a predefined threshold, since this would require a comparison of the traffic volume and a
15 threshold. Sharma does not disclose or suggest that a comparison of the traffic volume and a threshold occurs either inherently or explicitly. Independent claims 7, 17, and 22, require determining if said web resource request is served by a domain having a *traffic volume* that exceeds a predefined threshold; and redirecting said web resource request to a proxy server associated with said domain.

- 20 Thus, Sharma et al. do not disclose or suggest determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web resource request to a proxy server associated with said domain, as required by independent claims 7, 17, and 22.

Additional Cited References

- 25 Gampper et al. were also cited by the Examiner for disclosing a proxy cache system for saving files of a predetermined minimum size and greater into secondary storage in the cache (col. 6, lines 31-59). Gampper et al. is directed to a system, method, and program for caching files

retrieved from a server over a network. (See, Abstract.) Gampper does not address the issue of redirecting web requests to proxy servers.

Thus, Gampper et al. do not disclose or suggest redirecting said web resource request to a proxy server associated with said file type, as required by independent claims 1, 13, and 21, and do not disclose or suggest determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web resource request to a proxy server associated with said domain, as required by independent claims 7, 17, and 22.

Smith was also cited by the Examiner for disclosing the access requests in a distributed cache and the addition of a new proxy server into the network (FIG. 11; col. 18, lines 49-53). Smith does not address the issue of considering file type when redirecting web requests to a proxy server. In addition, although Smith considers load factor to assign some proxy servers proportionately more URL data objects, the load factor is “incorporated in the creation of the combined hash values” (col. 5, lines 25-28) and is thus performed *prior to receiving the web resource request*.

Thus, Smith does not disclose or suggest redirecting said web resource request to a proxy server associated with said file type, as required by independent claims 1, 13, and 21, and does not disclose or suggest determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web resource request to a proxy server associated with said domain, as required by independent claims 7, 17, and 22.

Yoakum et al. were also cited by the Examiner for disclosing a request that is passed to subsequent proxy servers which performs a database look-up to determine if a message can be fulfilled. Applicants note that Yoakum is directed to a system for implementing a real-time distributed, hierarchical database using a proxiabile protocol (see, Abstract). Yoakum does not address the issue of considering file type when redirecting web requests to a proxy server.

Thus, Yoakum et al. do not disclose or suggest redirecting said web resource request to a proxy server associated with said file type, as required by independent claims 1, 13, and 21, and do not disclose or suggest determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web resource request to a

proxy server associated with said domain, as required by independent claims 7, 17, and 22.

Jordan was also cited by the Examiner for its disclosure of a method for load balancing proxy cache servers by forwarding requests. Applicant notes that Jordan is directed to load balancing among cooperating cache servers and in particular to load balancing based on load conditions and a frequency that requests are forwarded from cooperating cache servers (col. 1, lines 6-9). Jordan does not address the issue of considering file type when redirecting web requests to a proxy server.

Thus, Jordan does not disclose or suggest redirecting said web resource request to a proxy server associated with said file type, as required by independent claims 1, 13, and 21, and does not disclose or suggest determining if said web resource request is served by a domain having a traffic volume that exceeds a predefined threshold; and redirecting said web resource request to a proxy server associated with said domain, as required by independent claims 7, 17, and 22.

Dependent Claims 2-6, 8-12, 14-16 and 18-20

Dependent claims 3 and 15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Braddy in view of Yoakum et al., claims 2, 4, 5, 14, and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Braddy and Yoakum in further view of Gampper et al., claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Braddy and Yoakum in further view of Smith, claims 8-11, 18, (19), and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sharma et al. in view of Jordan, and claim 12 was rejected under 35 U.S.C. §103(a) as being unpatentable over Sharma and Jordan in further view of Smith.

Claims 2-6, 8-12, 14-16 and 18-20 are dependent on claims 1, 7, 13, and 17, respectively, and are therefore patentably distinguished over Braddy, Yoakum et al., Gampper et al., Smith, Sharma et al., and Jordan (alone or in any combination) because of their dependency from independent claims 1, 7, 13, and 17 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin M. Mason". The signature is fluid and cursive, with the first name "Kevin" being the most prominent.

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